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**From:** Bacey, Juanita@DTSC [Juanita.Bacey@dtsc.ca.gov]  
**Sent:** 6/24/2020 6:44:39 PM  
**To:** Howard, Leslie Ann CIV USN BRAC PMO SAN CA (USA) [leslie.howard@navy.mil]  
**CC:** tina.low@waterboards.ca.gov; Praskins, Wayne [Praskins.Wayne@epa.gov]; Ueno, Karen [Ueno.Karen@epa.gov]; Amy.Brownell@sfdph.org  
**Subject:** RE: Parcel D-1 Remedial Action Completion Report - Phase II Durable Cover

Thanks.

-----Original Message-----

From: Howard, Leslie Ann CIV USN BRAC PMO SAN CA (USA) <leslie.howard@navy.mil>  
Sent: Wednesday, June 24, 2020 8:15 AM  
To: Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>  
Subject: Re: Parcel D-1 Remedial Action Completion Report - Phase II Durable Cover

Morning Nina,

Yes, thank you for the CDPH comment...the Draft Final is now due 09/04/20? so be in line with the ESD schedule. I will check to see about sending the RTCs via email a few weeks prior to submittal of the DF document.

Thank you

Leslie

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From: Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>  
Sent: Wednesday, June 24, 2020 7:53 AM  
To: Howard, Leslie Ann CIV USN BRAC PMO SAN CA (USA)  
Subject: [Non-DoD Source] Fw: Parcel D-1 Remedial Action Completion Report - Phase II Durable Cover

Hi Leslie,

Just resending this. Please acknowledge the one comment from CDPH and let me know about the RTCs. Thx.

Nina

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From: Bacey, Juanita@DTSC  
Sent: Monday, June 15, 2020 6:07 PM  
To: Howard, Leslie Ann CIV USN BRAC PMO SAN CA (USA) <leslie.howard@navy.mil>  
Subject: Parcel D-1 Remedial Action Completion Report - Phase II Durable Cover

Hi Leslie,

I show that the draft RACR was submitted to the agencies on 4/10/2019. I provided DTSC comments on 5/20/2019. And then on 6/12 I have an email from you asking for the first 2 month extension to submit the draft final. Did the Navy ever send RTCs? I show no record. Was it going to go straight to draft final?

I do have one comment from CDPH that I would like to provide. They submitted it to DTSC on 7/3/2019 when the document was on hold.

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Section 3.9.2 Reference Area: "Per Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) (U.S. Nuclear Regulatory Commission et al., 2000), ---- being investigated, but has not been contaminated by site activities."

Comment: The soil reference area located near Building 810 is surrounded by contaminated areas. Further, reference area data provided in Table 2 has a wide range of counts per minute. Using this highly variable reference area background data statistically is not justifiable as Standard Deviation is too large and "Intervention Level" (IL) computed with this will be too high to cross to invite intervention for follow-ups.

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Please let me know if you have any questions. Thx.

Nina